



THOMAS AMBROSIO

ATTORNEY AT LAW

Member of NJ & NY Bars

June 9, 2020

Via ECF

The Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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MEMO ENDORSED

Re: USA vs. Jason Moye
15-cr-537 (VEC)

Dear Judge Caproni:

Your Honor appointed me to represent Mr. Moye for purposes of re-sentencing scheduled for June 29, 2020 and further ordered that sentencing submissions are due June 15, 2020 (Document 1484)

Because of my inability to personally meet with Mr. Moye during the ongoing COVID-19 pandemic I am respectfully requesting that Your Honor adjourn Mr. Moye's re-sentencing date and the deadline for the filing of sentencing submissions to a date in September. Mr. Moye originally was sentenced to 37 years. On re-sentencing he faces a sentence 25 years to life. Given the magnitude of his potential sentence and in order to adequately represent Mr. Moye I must meet with him in person.

Furthermore, I cannot represent to the Court that Mr. Moye is willing to knowingly and voluntarily waive his physical presence at his re-sentencing.

I have spoken to Samson Enzer, AUSA about this request for adjournment and on behalf of the government he does not object.

I thank Your Honor for your consideration of this adjournment request. I hope this letter finds you well and well, I remain

Respectfully yours,
/s/Thomas Ambrosio
Thomas Ambrosio

cc: All Counsel via ECF
Jason Moye (via regular mail)

The June 29 sentencing is adjourned to **September 11, 2020, at 2:00 P.M.** Sentencing submissions are due by **August 28, 2020.**

SO ORDERED.

Date: 06/09/2020



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE